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10 **IN THE DISTRICT COURT
11 FOR THE NORTHERN MARIANA ISLANDS**

12 **LI FENFEN,**) **Civ. No. 07-0033**
13 Plaintiff,)
14 vs.) **PRE-DISCOVERY
15 Defendants.) DISCLOSURE STATEMENT**
16)
17) **(Pursuant to Fed.R.Civ.P. 26(a)
18) and Local Rule 16.2CJ(d))**
19)
20) **Conference: January 22, 2008
21) 8:30 am**
22)
23)
24)
25)
26)
27)
28)

14 Comes now Plaintiff Li Fenfen, through undersigned counsel and pursuant to Rule 26(a)(1)
15 of the Federal Rules of Civil Procedure and D.N.M.I. Local Rule 16.2CJ(d), and hereby makes the
16 following disclosures:

17 **Disclosures Pursuant to Rule 26(a)(1)(A) (Persons With Discoverable Information):**

18 At present, Plaintiff is aware of the following individuals who are likely to have discoverable
19 information that she may use to support her claims:

- 20 1. Li Fenfen (Plaintiff)
21 2. The following current or former personnel of Defendant Seahorse:

22 Bangu (full name and spelling uncertain)

23 Zhang Hua

24 The subject matter of the discoverable information is the circumstances of Plaintiff's
25 jet ski accident.

- 26 3. The following medical personnel:

1 Dr. Thomas Austin (CHC)

2 Dr. Martin P. Rohringer (CHC)

3 Staff of Funing District Central Hospital – Chengzhen City, Funing District,
4 Zhejiang Province, China

5 The subject matter of the discoverable information is the nature and treatment of
6 Plaintiff's injury.

- 7 4. The following friends, relatives, and business associates of Plaintiff:

8 Liu Jinxia

9 Song Jing

10 Dong Chunlin

11 Yu Feng Cepeda

12 Shao Hong C. Walker

13 Zhang Aizhen

14 The subject matter of the information is Plaintiff's physical, emotional, economic
15 and employment conditions after the accident.

16

17 **Disclosures Pursuant to Rule 26(a)(1)(B) (Documents, Data and Tangible Things)**

18 The following documents, data compilations, and tangible things are in the possession,
19 custody or control of Plaintiff, that she may use to support her claims:

- 20 1. medical bills and records
- 21 2. x-rays

22

23 **Disclosures Pursuant to Rule 26(a)(1)(C) (Computation of Damages)**

24 Plaintiff claims for damages in approximately the following amount:

- 25 1. medical expenses incurred to date: c. \$968.94
- 26 2. return airfare from China: c. \$389.85
- 27 3. anticipate future medical expenses: c. \$50,000.00 (including removal of plate, scar
28 removal, rehabilitative therapy, and airfare)

4. lost wages: c. \$4260.00
5. compensation for long-term or permanent loss of use of hand, pain, suffering, emotional distress, lost future earnings, etc.: to be determined, but currently estimated at c. \$300,000
6. liquidated damages under Consumer Protection Act: an additional amount equal to the total of the above
7. attorneys fees and costs: to be determined.

Disclosures Pursuant to Rule 26(a)(1)(D) (Insurance Agreement)

N/A.

Plaintiff will supplement these disclosures if and when further information becomes available.

Respectfully submitted this 17th day of January, 2008.

O'CONNOR BERMAN DOTT & BANES
Attorneys for Plaintiff

By: _____ /s/ _____
Joseph E. Horey

3414-01-080116-preliminary disclosures.wpd